

1 JOSEPH T. McNALLY
2 Acting United States Attorney
3 LINDSEY GREER DOTSON
4 Assistant United States Attorney
5 Chief, Criminal Division
6 CATHARINE A. RICHMOND (Cal. Bar No. 301184)
7 Assistant United States Attorney
8 Violent & Organized Crime Section
9 1300 United States Courthouse
10 312 North Spring Street
11 Los Angeles, California 90012
12 Telephone: (213) 894-7162
13 Facsimile: (213) 894-0141
14 Email: catharine.richmond@usdoj.gov

15 Attorneys for Plaintiff
16 UNITED STATES OF AMERICA

17 UNITED STATES DISTRICT COURT

18 FOR THE CENTRAL DISTRICT OF CALIFORNIA

19 UNITED STATES OF AMERICA,

20 No. CR 25-40-HDV-3

21 Plaintiff,

22 v.
23 GOVERNMENT'S APPLICATION FOR A
24 WRIT OF HABEAS CORPUS AD
PROSEQUENDUM AND MOTION TO STRIKE
PREVIOUSLY ISSUED WRIT OF HABEAS
CORPUS AD PROSEQUENDUM

ROHAN SANDEEP RANE, ET AL.,
KALEB CHRISTOPHER MERRITT,

Defendant.

Plaintiff United States of America, by and through its counsel of record, the Acting United States Attorney for the Central District of California and Assistant United States Attorney Catharine Richmond, hereby files its application for a writ of habeas corpus ad prosequendum and motion to strike previously issued writ of habeas corpus ad prosequendum.

On February 12, 2025, the government filed a writ of habeas corpus ad prosequendum for defendant Kaleb Christopher Merritt in the above-captioned case. That same day, February 12, 2025, the Honorable Karen Stevenson, Magistrate Judge for the Central District

1 of California, issued the writ. (United States v. Rane, et al., CR
2 25-40-HDV ("Dkt."), order at 24 and writ at 25). Yesterday, the
3 United States Marshals Service asked me to obtain a new writ with an
4 appearance date approximately 60 days from the date of the request
5 for the writ to allow for more time for the Marshals to transport the
6 defendant.

I am therefore (1) applying again for a writ, but this time with the modification requested by the Marshals and (2) moving to strike the writ issued by Judge Stevenson on February 12, 2025, at docket 25, to avoid duplicative or conflicting orders.

11 Dated: 02/14/25 Respectfully submitted,

JOSEPH T. MCNALLY
Acting United States Attorney

LINDSEY GREER DOTSON
Assistant United States Attorney
Chief, Criminal Division

Catharine Richmond

CATHARINE A. RICHMOND
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA